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Federal Communications Commission
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

January 27, 1999

VIA FACSIMILE AND U.S. MAIL

H. Gilbert Miller, Ph.D.
Vice President
Center for Telecommunications and Advanced Technology
Mitrotek Systems
7525 Colshire Drive
McLean, Virginia 22102-7400

Re: North American Numbering Plan Administration

Dear Dr. Miller:

As you know, on January 7, 1999, the Common Carrier Bureau (Bureau) released a public notice¹ relating to the December 21, 1998 filing by Lockheed Martin IMS Corporation (Lockheed Martin) of a Request for Expeditious Review of the Transfer of the Lockheed Martin Communications Industry Services (CIS) Business to a new independent company, Warburg, Pincus & Co.² The CIS business unit of Lockheed Martin IMS currently serves as the North American Numbering Plan Administrator (NANPA).

Because of the nature of the functions performed by the NANPA, in the January 7 Public Notice, the Bureau determined that interested parties should be permitted to raise reasonable and relevant questions concerning the Lockheed Martin Request and outlined the procedures it intended to follow for that purpose. Specifically, the Bureau required all issues and/or questions to be filed with the Bureau on or before January 22, 1999. After evaluating the public input to ensure relevance and to avoid duplication, the Bureau indicated that it would forward a consolidated list of issues and questions to Lockheed Martin for response, within 15 days following receipt. Finally, the Bureau indicated that it would place Lockheed Martin's responses on public notice as soon upon receipt as possible and seek comment from

¹ FCC Seeks Comment on Request for Expeditious Review of the Transfer of the Lockheed Martin Communications Industry Services Business, Public Notice, CC Docket No. 92-237, NSD File No. 98-151 (rel. Jan. 7, 1999) (January 7 Public Notice).

² In the Matter of Request of Lockheed Martin Corporation and Warburg, Pincus & Co. for Review of the Transfer of the Lockheed Martin Communications Industry Services Business from Lockheed Martin Corporation to an Affiliate of Warburg, Pincus & Co., NSD File No. 98-151 (Dec. 21, 1998) (Lockheed Martin Request).

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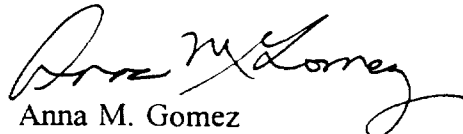
the public by March 17, 1999, on whether it should recommend to the Commission that the Lockheed Martin Request be granted, with or without any conditions.

The January 7 Public Notice also recognizes that the Commission adopted the NANC's recommendation that Mitretek serve as the alternate NANPA, to assume NANPA responsibilities should Lockheed Martin not perform in a satisfactory fashion, and that Mitretek has urged the Commission to name it as the NANPA successor to Lockheed Martin. Accordingly, the Bureau also sought public input on issues and questions that Mitretek should be permitted to answer following procedures identical to those outlined above.

We now have reviewed the public input received in response to the January 7 Public Notice. Attached hereto is a list of questions and issues directed to Mitretek that we consider relevant to the Lockheed Martin Request and on which it seeks response. Responses should be submitted to the Bureau within 15 days of receipt, that is, on or before **February 12, 1999**. We note that Lockheed Martin also has received a list of questions for response by February 12, 1999. To expedite consideration of the Lockheed Martin Request and resolution of the underlying issues, we encourage Mitretek to fully and thoroughly answer each of the questions posed on the attached list.

The Bureau appreciates your cooperation in this matter. Should you have any questions, please direct them either to Kris Monteith, (202) 418-1098, or Jeannie Grimes, (202) 418-2313.

Sincerely,



Anna M. Gomez
Chief, Network Services Division
Common Carrier Bureau

cc: Alan C. Hasselwander

**Common Carrier Bureau
Federal Communications Commission
January 27, 1999**

**Questions For Mitretek Systems Concerning
Request for Expeditious Review of the Transfer of the
Lockheed Martin Communications Industry Services Business**

1. How long does Mitretek anticipate that the transfer of North American Numbering Plan Administration (NANPA) functions will take and how will it be accomplished?
2. Why does Mitretek still want to perform the NANPA functions?
3. Does Mitretek still have the financial resources to perform the NANPA functions?
4. How has Mitretek been involved in numbering issues since 1997 when Lockheed Martin IMS (Lockheed Martin) was selected as the NANPA?
5. Does Mitretek intend to fulfill the current NANPA agreement for the same price as Lockheed Martin or will it stand by its original bid?
6. Does Mitretek expect the NANPA functions to be a profit-making business?
7. Who will absorb the costs for the transition from Lockheed Martin to Mitretek?
8. Has Mitretek established any affiliations with telecommunications providers that could compromise its neutrality since its initial bid to provide NANPA services?
9. Have any changes occurred relating to Mitretek's business interests since the initial neutrality review that would impact Mitretek's neutrality compliance?
10. How will Mitretek provide assurance that it can manage a NANPA transition from Lockheed Martin without any interruption or negative impact to service providers and other users of the NANP?
11. Will Mitretek provide indemnification to carriers for damages that may occur in the transition from Lockheed Martin to Mitretek should it be designated as the NANPA successor?
12. If Mitretek were chosen to be the successor as the NANPA, what assurances and guarantees will Mitretek give that it will perform those duties effectively and that any transition will be accomplished smoothly and effectively?

13. If Mitretek is chosen to be the successor as the NANPA, what guarantees will Mitretek give to assure that it will maintain an adequate level of competent personnel to perform the required duties of the NANPA?

14. If Mitretek is chosen to be the successor as the NANPA, what assurances and guarantees will Mitretek give that it will provide the financial resources necessary to support the NANPA, including potential duties in the future (for example 1000 block number pooling administration)?